

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re

Chapter 11

DELPHI CORPORATION, et al.,

Case No. 05-44481 (RDD)

Debtors.

(Jointly Administered)

**Response of Claimant, Alice J. Banus, Trustee of the Alice J. Banus Trust U/A/D  
010600 in Opposition to Debtors' First Omnibus Objection to Equity Claims**

Claimant Alice J. Banus, Trustee of the Alice J. Banus Trust U/A/D 010600 ("Trustee"), respectfully responds in opposition to Debtors' First Omnibus Objection to Equity Claims. Trustee timely filed her proof of claim (claim number 4517) on May 12, 2006, well in advance of the established Bar Date of July 31, 2006. Trustee is a widow without any formal legal training, and although her claim is not for a large dollar amount, she nevertheless relied on the proof of claim form, served on her by the Debtors, as genuine. Thereby, Trustee properly completed and signed the proof of claim and timely returned said proof of claim, pursuant to the terms of the accompanying notice, along with the necessary documentation to support Trustee's claim. Debtors' contention that the Bar Date Order did not require claimants, who held an exclusive equity interest in Delphi, to file proofs of claim is moot since the Debtors properly served Trustee with a valid proof of claim form along with instructions to complete and return the proof of claim on or by the established Bar Date, which Trustee did. Moreover, Trustee need not be concerned or responsible for whatever administrative obstacles that the Debtors or their "claims agent" may have encountered while trying to get out from under their accountability for their obligations, legal or otherwise. Finally, Debtors' contention that disallowance of Trustee's claim will not impair any entitlements she may ultimately have under a separate plan of reorganization is both immaterial as well as false because if Trustee's claim is disallowed or expunged, Trustee's proof of claim would also be disallowed or expunged.

Therefore, Trustee prays this Court to deny Debtors' First Omnibus Objection to Trustee's Equity Claim.

Respectfully submitted,

*Alice J. Banus, TTEE*

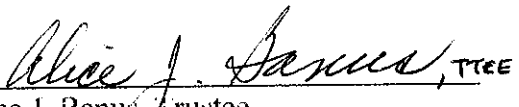
Alice J. Banus, Trustee  
15153 Olympus Way  
Strongsville, OH 44149  
(440) 846-1112

**Certificate of Service**

Response of Claimant, Alice J. Banus, Trustee (claim number 4517), was served this 6<sup>th</sup> day of October, 2006, upon the parties listed in Debtor' First Omnibus Objection as follows:

via certified mail to the Honorable Robert D. Drain, Judge, UBSC;

via regular mail on all remaining listed parties and individuals.

  
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Alice J. Banus, Trustee  
Claim Number 4517  
15153 Olympus Way  
Strongsville, OH 44149  
(440) 846-1112